

Barentzen, Steven

From: Barentzen, Steven
Sent: Thursday, August 11, 2005 2:50 PM
To: 'Gina MacNeill'
Cc: Jerry S. Goldman
Subject: RE: Stipulation of Briefing Schedule for Taha Al Alwani

Ms. MacNeill:

I did not know that you intended to include a provision in the stipulation permitting you to file a RICO Statement. We agree with counsel for Mr. Bin Mahfouz, Williams & Connolly, who in their August 8, 2005 letter to Judge Casey stated that Case Management Order No. 2 only applies to the Federal Insurance plaintiffs. We also believe that to be the case and do not believe you should be permitted to file a RICO statement at this late date.

Moreover, I cannot agree to waive service as a defense. As I told Mr. Goldman yesterday, we intend to defend this action on the ground that you served the wrong Taha Al Alwani.

If you remove those two paragraphs we can agree to the stipulation. If you will not agree to these revisions, please let me know immediately, as we intend to write to Judge Casey and advise him of our support of Williams & Connolly's August 8, 2005 letter.

Very truly yours, Steven Barentzen:

From: Gina MacNeill [mailto:gmacneill@goldmanlawyers.com]
Sent: Thursday, August 11, 2005 10:59 AM
To: Barentzen, Steven
Cc: Jerry S. Goldman
Subject: Stipulation of Briefing Schedule for Taha Al Alwani

Please find attached a proposed briefing schedule.

Please advise whether this is acceptable.

*Gina M. MacNeill, Esquire
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